



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



442773

REPLY TO THE ATTENTION OF:

AUG 23 2007

Terry Diamond
Neal & Leroy, LLC
203 N. LaSalle Suite 2300
Chicago, Illinois. 60601

RE: Peoples Gas Site

Dear Ms. Diamond:

Enclosed is a copy of the letter that was sent to Arne Duncan. If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Felitti".

Peter Felitti

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

August 16, 2007

REPLY TO THE ATTENTION OF: SR-6J

Arne Duncan
Chief Executive Officer
Board of Education of the City of Chicago
125 South Clark Street #500
Chicago, Illinois 60603

RE: North Shore Avenue Station Site – Rogers Park Sub-Shop East Parcel Site – 6712 North Whipple Street, Chicago, IL

Dear Mr. Duncan:

The purpose of this letter is to provide the status of the United States Environmental Protection Agency's ("U.S. EPA's") work at the North Shore Avenue Station Site.

On June 5, 2007 Peoples Gas Light and Coke Company ("Peoples Gas") entered into an Administrative Order on Consent (V-W-'07-C-869) ("the AOC") with U.S. EPA which requires the company to perform an Engineering Evaluation/Cost Analysis ("EE/CA") at eleven former manufactured gas plant sites located in the City of Chicago. The EE/CA is a particular type of analysis performed pursuant to U.S. EPA's Superfund Program. The parcel located at 6712 North Whipple Street, Chicago, IL, "the East Parcel," which is currently owned by The Board of Education, is currently described in the AOC as being part of the North Shore Avenue Station Site, ("Site"). Prior to this agreement some of the eleven sites were being addressed under a State of Illinois Environmental Protection Agency ("Illinois EPA") program called the Site Remediation ("SRP") Program. The North Shore Avenue Station Site was one of those sites.

On October 8, 2002 Illinois EPA issued a No Further Remediation ("NFR") Letter (see attached) to People's Gas for, inter alias, the East Parcel, which stated that the letter "... shall be considered prima facie evidence that the Remediation Site...does not constitute a threat to human health and environment and does not require further remediation under the Act if utilized in accordance with the terms of the Letter." It is U.S. EPA's understanding that based on that letter the Board of Education purchased the property to construct a new school building.

After receiving notice of the AOC, the Board of Education requested that U.S. EPA review the status of work at this Site to assess whether any additional work would be required by

U.S. EPA on the East Parcel and/or whether the East Parcel is considered part of the North Shore Avenue Station Site to be addressed under the AOC.

Section III of *Addendum No. 1 of the April 6, 1995 Superfund Memorandum of Agreement between the Illinois Environmental Protection Agency and the United States Environmental Protection Agency, Region V*, states, "If a site in Illinois has been remediated or investigated under the Site Remediation Program, and IEPA has approved the remediation as complete or made a no-action determination upon review of investigation, consistent with existing information the site will not be expected to require further response actions." Accordingly, U.S. EPA Region 5 will not plan or anticipate any federal action under the Superfund Program unless, under exceptional circumstances, the site poses an imminent threat or emergency situation."

When the AOC was executed, U.S. EPA was unaware that the Illinois EPA had issued an NFR for the East Parcel. If known at that time, the Agency would have sought to exclude the East Parcel from the defined site area to be investigated. Nonetheless, U.S. EPA has already taken the step to review all of the available information regarding the previous investigations and cleanup work performed on the East Parcel to assess whether any additional work should be performed to address site related contamination. The information reviewed and relied upon for this assessment included a site inspection, *the Rogers Park Sub-Shop East Parcel Site Investigation Report (January 2002)*, *the Remediation Objectives Report/Remedial Action Plan/Remedial Action Completion Report of the Rogers Park Sub-Shop East Parcel (May 2002)*, and the October 8, 2002 Illinois EPA No Further Remediation letter to Peoples Gas. The information below summarizes the Agency's understanding of the East Parcel and the work performed to date.

Background

Peoples Gas owned an 8.4-acre parcel of land located in Chicago, Illinois referred to as the Rogers Part Sub-Shop Facility (formerly as the North Shore Avenue Station). The Rogers Park Sub-Shop has recently been subdivided into three (3) separate parcels, East, Main, and Pond.

In 1926, the North Shore Avenue Station began operating a storage facility for manufactured and natural gas. A 15-million cubic foot gas holder stored manufactured and natural gas until it was dismantled in 1971. The gas holder was tar sealed until mid-1965 when the sealant was changed to oil. The gas holder was disconnected and purged in 1969. Most tar tanks along with the holder were removed in 1971. A transformer house was the only former gas plant structure located on the East Parcel.

The East Parcel, approximately 3 acres in size, is currently a vacant lot, covered by vegetation and an unused paved entrance to the property. The address of the East parcel is 6712 North Whipple Street. The East parcel is currently owned by the Board of Education of the City of Chicago.

In December 1999 Peoples Gas began a process of investigating and cleaning up the North Shore Avenue Station, including the East parcel, as part of the Illinois EPA SRP. Between December 1999 and June 2002 Peoples Gas completed the investigation of the North Shore Avenue Station and the results are summarized in the January 2002 "The Rogers Park Sub-Shop East Parcel Site Investigation Report." During the course of the investigations thirty-two (32) soil borings were advanced and two (2) trenches were dug. Two (2) of the borings were converted to monitoring wells. Soil samples were collected from various depths and analyzed for Target Compound List (TCL) volatile organic compounds (VOCs), or benzene, toluene, ethylbenzene, xylenes (BTEX), TCL semivolatile organic compounds (SVOCs), or polynuclear aromatic hydrocarbons (PAHs), Resource Conservation and Recovery Act (RCRA) or priority pollutant metals and/or cyanide. Other samples were analyzed for synthetic precipitation leaching procedure (SPLP) metals, pesticides, and polychlorinated biphenyls (PCBs). Groundwater samples were collected from two monitoring wells located on the East Parcel and three monitoring wells located on surrounding areas and were analyzed for TCL VOCs, PAHs, RCRA metals, and total cyanide. During the SI field activities, no source material, soil staining odors or PID readings were observed in the surface or subsurface soils on the East Parcel.

Exposure pathways identified for evaluation include soil ingestion, soil inhalation, soil migration to Class II groundwater, and ingestion of Class II groundwater. A Tier 1 evaluation, in accordance with the Tiered Approach to Corrective Action Objectives ("TACO"), as specified in 35 IAC Part 742, was conducted to evaluate residential population exposures via these exposure routes. However, the construction worker exposure via inhalation of naphthalene was evaluated because the Tier 1 objective is more stringent than the residential exposure. Exceedances of Tier 1 values for soil ingestion were identified in surface soils for a limited number of PAH constituents, with the exception of a limited area where the measured concentration of benzo(a)pyrene exceeded the Tier 1 screening level at 6 to 8 feet below ground surface. SPLP barium exceeded the soil migration to Class II groundwater pathway in two limited areas. No groundwater samples exceeded the Tier 1 levels for ingestion of Class II groundwater exposure pathway.

Based on these results, remedial objectives were established with the understanding that the future use of the East Parcel will be unrestricted residential. Therefore, the TACO Tier 1 PAH objectives pertaining to a residential population were used as remediation objectives for the East Parcel, with the exception of naphthalene, where the more stringent construction worker inhalation objective was established. In order to further demonstrate that the TACO Tier 1 "Soil Migration to Class II Groundwater Objectives for Metals" were achieved, remediation objectives were also established for SPLP barium, cadmium, chromium, lead, mercury, and silver.

The remedy for the site was to excavate and dispose of impacted soil offsite. All excavation activities on the East Parcel occurred during the June 2001 event and March 2002 event. Excavation of the impacted soil was conducted at specified depths across the site. Based on the SI findings, excavation on the East Parcel was planned to consist of limited shallow excavation, with the exception of one limited area, where excavation to a depth of 8 feet below ground surface was anticipated.

The excavation on northern portion of the East Parcel was performed to depths of between 6 and 24 inches. During excavation activities on the East Parcel, some areas required additional limited excavation in order to achieve the remedial action objectives based on the confirmation samples that were collected. The excavation in the northeast corner of the parcel, an area of 20-feet by 20-feet, was excavated to 8 feet below ground surface. The excavation on the southern portion of the parcel was originally designed to remove soil from 6 inches to 3 feet below ground surface. Based on confirmation sample results an additional 1-foot of soil was removed from some portions. Confirmation sample results from the excavation activities show all excavations achieved the planned remedial action objectives for all contaminants.

Approximately 3,600 tons of special waste was disposed of in the CID Landfill.

Conclusions

Based on our current understanding of the Site and the information presented to the Agency by Illinois EPA and Peoples Gas, we believe that no further work should be required on the East Parcel property and it should be excluded from further work under the June 5, 2007 AOC. All work performed at the site generally complies with U.S. EPA standards. Therefore, the East Parcel will not be considered part of the North Station Avenue Station Site and is not covered by the requirements of the AOC. Should new information become available EPA may re-evaluate the need for additional work.

If you should have any questions concerning this matter feel free to give me a call at (312) 886-5122, or email at prendiville.timothy@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy Prendiville', with a stylized flourish at the end.

Timothy Prendiville
Remedial Project Manager

cc: Patrick J Rocks, General Counsel